

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

This Document Relates To:

*DeKalb County School District v. Meta Platforms,
Inc., et al.*

**DECLARATION OF DAVIS
VAUGHN IN SUPPORT OF
PLAINTIFF DEKALB COUNTY
SCHOOL DISTRICT'S
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT (SD MSJ
No. 5)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026
Time: 8:00 AM
Place: Courtroom 1, 4th Floor

1 I, Davis Vaughn, declare under penalty of perjury:

2 1. I am an attorney duly admitted to practice law in Alabama and admitted *pro hac*
3 *vice* in this Court. I am a Principal with the Beasley Allen Law Firm and am counsel for the
4 Plaintiff DeKalb County School District. I have personal knowledge of the facts stated in this
5 Declaration, and if called upon to do so, could and would competently testify thereto.

6 2. I submit this Declaration in support of DeKalb County School District's Opposition
7 to Defendants' Motion for Summary Judgment (SD MSJ No. 5) ("Motion"), filed concurrently
8 with this Declaration.

9 3. Attached as Exhibit 1 is a true and correct copy of the Expert Report of Sharon A.
10 Hoover, Ph.D., dated May 16, 2025.

11 4. Attached as Exhibit 2 is a true and correct copy of relevant portions of the transcript
12 from the deposition of Kishia Towns, Ph.D. on March 17, 2025.

13 5. Attached as Exhibit 3 is a true and correct copy of relevant portions of the transcript
14 from the deposition of Deborah Moore-Sanders, Ph.D. on April 9, 2025.

15 6. Attached as Exhibit 4 is a true and correct copy of relevant portions of the transcript
16 from the deposition of Darnell Logan, Ed.D. on April 16, 2025.

17 7. Attached as Exhibit 5 is a true and correct copy of relevant portions of the transcript
18 from the deposition of Denise Revels on April 18, 2025.

19 8. Attached as Exhibit 6 is a true and correct copy of the Amended Expert Report of
20 Sharon A. Hoover, Ph.D., dated June 20, 2025.

21 9. Attached as Exhibit 7 is a true and correct copy of relevant portions of the transcript
22 from the deposition of Sharon A. Hoover, Ph.D. on August 12, 2025.

23 10. Attached as Exhibit 8 is a true and correct copy of the affidavit of Darnell Logan,
24 Ed.D., executed on May 15, 2025.

25 11. Attached as Exhibit 9 is a true and correct copy of the following DeKalb document:
26 DEKALB726964.
27
28

12. Attached as Exhibit 10 is a true and correct copy of the following DeKalb documents: DEKALB876954—DEKALB876956.

13. Attached as Exhibit 11 is a true and correct copy of relevant portions of the transcript from the deposition of Monika Davis on April 14, 2025.

14. Attached as Exhibit 12 is a true and correct copy of the affidavit of Monika Davis, executed on May 16, 2025.

15. Attached as Exhibit 13 is a true and correct copy of the following DeKalb documents: DEKALB2139358—DEKALB2139361.

16. Attached as Exhibit 14 is a true and correct copy of the Expert Report of Robert L. Klein, dated May 18, 2025.

17. Attached as Exhibit 15 is a true and correct copy of the Expert Report of Jeffrey E. Meyers, dated May 19, 2025.

18. Attached as Exhibit 16 is a true and correct copy of relevant portions of the transcript from the deposition of Norman Sauce, Ed.D. on April 15, 2025.

19. Attached as Exhibit 17 is a true and correct copy of the affidavit of Kishia Towns, Ph.D., executed on November 3, 2025.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and accurate.

DATED: November 7, 2025

BY: /s/ Davis Vaughn
Davis Vaughn
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